

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

11 EXECUTIVE LENS LLC, ) Case No. 5:25-cv-06048-NC  
12 Plaintiff, ) [PROPOSED] ORDER GRANTING  
13 v. ) DEFENDANT LEE RAPKIN'S  
14 LEE RAPKIN and JOHN DOE dba "the ) MOTION TO DISMISS  
15 Exposer" www.youtube.com@1aAudits ) Date: January 14, 2026  
16 Exposé, ) Time: 11 a.m. PT  
17 Defendant. ) Place: Courtroom 5 – 4th Floor  
18 ) Judge: Nathanael M. Cousins  
19 ) Complaint Filed: July 17, 2025  
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19 The Motion to Dismiss filed by Defendant Lee Rapkin ("Defendant Rapkin"  
20 or "Ms. Rapkin") came on regularly for hearing on January 14, 2026, at 11:00  
21 a.m., in Courtroom 5 of the above captioned Court, Hon. Nathanael M. Cousins,  
22 presiding.

23 The Court, having considered all of the pleadings, evidence and argument of  
24 the parties submitted in support of and opposition to the Motion, and GOOD  
25 CAUSE APPEARING THEREFOR, IT IS HEREBY ORDERED, that:

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1 Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Ms.  
2 Rapkin's Motion to Dismiss is GRANTED and the claim against Ms. Rapkin in  
3 plaintiff's complaint (Dkt. 1) is dismissed without leave to amend.

4 **IT IS SO ORDERED.**

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7 Dated: \_\_\_\_\_, 2026

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HON. NATHANAEL M. COUSINS  
UNITED STATES MAGISTRATE JUDGE

## PROOF OF SERVICE

**STATE OF CALIFORNIA  
COUNTY OF SAN FRANCISCO**

I am employed in the County of San Francisco, State of California, I am over the age of eighteen years, and not a party to the within action. My business address is 150 California Street, Suite 1500, San Francisco, California 94111.

On December 9, 2025, I served the document(s) described as:

**[PROPOSED] ORDER GRANTING DEFENDANT LEE RAPKIN'S  
MOTION TO DISMISS**

on the parties in this action addressed as follows:

**SEE ATTACHED SERVICE LIST**

in the following manner:

- (BY E-MAIL):** by transmitting on this date via electronic mail the document(s) listed above to all parties with an e-mail address of record as set forth below and who have consented to electronic service in this action. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.
- (BY MAIL):** as follows: I am “readily familiar” with the firm’s practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.
- (BY PERSONAL SERVICE):** I caused such envelope(s) to be delivered by hand this date to the offices of the addressee(s).
- (BY CM/ECF/EFSP):** by electronic filing system notification with the clerk of the Court, or other electronic filing service provider pursuant to CCP § 1010.6(a), which will send a Notice of Electronic Filing to all parties with an e-mail address of record, who have consented to or filed a Notice of Consent to Electronic Service in this action.

I declare under penalty of perjury according to the laws of the State of California that the foregoing is true and correct.

Executed December 9, 2025, at San Francisco, California.

Patricia Inabnet

1 **SERVICE LIST**  
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